

## REMARKS

After entry of this amendment, the pending claim are claims 1-23 and 31-36 of which claims 1 and 7 are in independent form. Claims 7-14, 17, 18 and 36 have been allowed. Claim 1 has been amended. Claims 24-30 have been previously cancelled.

### Rejection Under 35 U.S.C. §102(e)

Claims 1-6, 15, 16, 19-23 and 31-35 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,746,559 to Omi et al. ("Omi ").

Omi describes a method for separating wafers with a jet fluid and using holders, one of which is fixed indirectly to a motor for rotating, while the other one is indirectly fitted to a spring (Fig.4 ; col.10 lines 48 to col.11, line 10). In Omi, the separating method uses an apparatus with two holders using for fixing the semiconductor wafer. During the separation step, Omi explains that the wafers are bended due to the high pressure of the wafer jet when there is small contact (col.11, lines 63-66) between the holders. The rotation of one holder combined with the application of the fluid jet leads to the separation of the wafers. Although the holders disclosed by Omi can move relative to each other, they are solid and undeformable without any flexibility.

The present invention is fundamentally different from Omi in that parts of the gripper members (i.e., the plates) are flexible or deformable and can be curved or resiliently bent by the action of the actuators (see paragraphs [0056] [0059] [0064] and Fig.2). The forces applied to the wafers by the bent, flexible holders enable the wafers to be separated.

Applicants have amended claim 1 to more clearly define Applicants' invention. Claim 1 now recites a "tool comprising two flexible gripper members for temporarily affixing to respective opposite faces of the wafers that are united to each other." Claims 7 already recites that at least one gripper member comprises a body generally in the form of a plate having different degrees of elastic deformability, and that claim has been allowed.

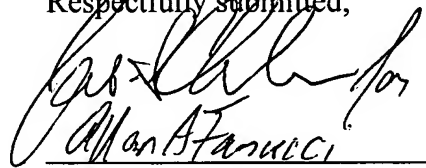
Applicants respectfully submit that the Omi '559 patent does not disclose, teach or suggest all the limitations of claim 1. Specifically, there is no disclosure, teaching or suggestion in the Omi '559 patent of a tool comprising two flexible gripper members. As all the features recited in independent claim 1, as amended, are not disclosed, taught or suggested by the Omi '559 patent, Applicants submit that this claim is allowable over the Omi '559 patent. Dependent

claims 2-6, 15, 16, 19-23 and 31-35 dependent from independent claim 1 and are allowable for at least the same reason as discussed above in connection with claim 1.

In light of Applicants' amendments and remarks, a notice of allowance is respectfully requested. Should the Examiner have any questions or concerns regarding the amendments, remarks or the above-identified application, then a telephonic interview with the undersigned is respectfully requested to discuss any such questions or concerns and to accelerate the allowance of the above-identified application.

No fee is believed due for this submission. However, should any fee be required, please charge all such fees to Winston & Strawn LLP Deposition Account No. 50-1814.

Respectfully submitted,

 for Reg No. 46,418  
Allan A. Fanucci

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Allan A. Fanucci

Reg. No. 30,256

**WINSTON & STRAWN LLP**  
CUSTOMER NO. 28765  
(212) 294-3311